

S. LANE TUCKER  
United States Attorney

C. CODY TIRPAK  
Assistant U.S. Attorney  
Federal Building & U.S. Courthouse  
222 West Seventh Avenue, #9, Room 253  
Anchorage, AK 99513-7567  
Phone: (907) 271-5071  
Email: cody.tirpak@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEREMY RUSSELL NICHOLS,

Defendant.

No. 3:24-cr-00061-SLG-KFR

COUNT 1

POSSESSION OF A CONTROLLED  
SUBSTANCE WITH INTENT TO  
DISTRIBUTE

Vio. of 21 U.S.C. § 841(a)(1), (b)(1)(A),  
(B), and (C)

COUNT 2

CONSPIRACY TO DISTRIBUTE AND  
POSSESS WITH INTENT TO  
DISTRIBUTE CONTROLLED  
SUBSTANCES

Vio. of 21 U.S.C. §§ 846 and 841(a)(1),  
(b)(1)(A), (B), and (C)

COUNT 3

POSSESSION OF A FIREARM DURING  
AND IN RELATION TO A DRUG  
TRAFFICKING CRIME

Vio. of 18 U.S.C. § 924(c)(1)(A)

CRIMINAL FORFEITURE

ALLEGATION 1:

21 U.S.C. § 853(a)(1) & (2) and  
28 U.S.C. § 2461(c) and Fed. R. Crim. P.  
32.2(a)

CRIMINAL FORFEITURE

ALLEGATION 2:

18 U.S.C. § 924(d) and 28 U.S.C.  
§ 2461(c) and Fed. R. Crim. P. 32.2(a)

**INDICTMENT**

The Grand Jury charges that:

COUNT 1

On or about November 13, 2023, within the District of Alaska, the defendant, JEREMY RUSSELL NICHOLS, did knowingly and intentionally possess with the intent to distribute, to wit: 50 grams or more of methamphetamine, a mixture and substance containing 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a substance containing heroin, and a substance containing cocaine.

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A), (B), and (C).

COUNT 2

On or about November 13, 2023, within the District of Alaska, the defendant, JEREMY RUSSELL NICHOLS, did knowingly and intentionally combine, conspire, confederate, and agree with others both known and unknown to the Grand Jury to distribute and possess with the intent to distribute controlled substances, to wit: 50 grams or more of methamphetamine, a mixture and substance containing 400 grams or more of N-phenyl-N-

[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a substance containing heroin, and a substance containing cocaine.

All of which is in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), (B), and (C).

### COUNT 3

On or about November 13, 2023, within the District of Alaska, the defendant, JEREMY RUSSELL NICHOLS, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Counts 1 and 2.

All of which is in violation of 18 U.S.C. § 924(c)(1)(A).

### CRIMINAL FORFEITURE ALLEGATION 1

The allegations contained in Counts 1-2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. §§ 853(a)(1) and (2), and 28 U.S.C. § 2461(c).

Pursuant to 21 U.S.C. §§ 853(a)(1) and (2), upon conviction of an offense in violation of 21 U.S.C. §§ 841 and 846, the defendant, JEREMY RUSSELL NICHOLS, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense; the property to be forfeited includes, but is not limited to:

1. Approximately \$6,634.00 in U.S. currency; and

If, as a result of any act or omission of defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of this court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States to seek forfeiture of other property of defendants pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c).

All pursuant to 21 U.S.C. § 853(a)(1) & (2), 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

#### CRIMINAL FORFEITURE ALLEGATION 2

The allegations contained in Count 3 of this Indictment is hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

Upon conviction of an offense in violation of 18 U.S.C. § 924(c)(1)(A), the defendant, JEREMY RUSSELL NICHOLS, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in knowing violation of the offense; the property to be forfeited includes, but is not limited to:

1. A Glock, Model 19, semi-automatic pistol, 9mm caliber, serial number BNYS474;

2. A Ruger, Model P90, semi-automatic pistol, .45 caliber, serial number 660-58477; and
3. Any and all associated magazines and ammunition.

All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ C. Cody Tirpak  
C. CODY TIRPAK  
Assistant U.S. Attorney  
United States of America

s/ S. Lane Tucker  
S. LANE TUCKER  
United States Attorney

DATE: 6/12/2024